

EXHIBIT A

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' MOTION TO COMPEL**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Plaintiffs' motion to compel Google to produce documents responsive to Plaintiffs' Tenth Set of Requests for Production. Plaintiffs' Motion is **GRANTED**.

RFP 279 seeks production of "all Documents relating to any Google job performance reviews . . . for each of the 24 Google custodians in this case." Performance reviews may bear on Google's culpability or on the credibility of its witnesses, and the burden of production is minimal. Google must produce its custodians' performance reviews.

RFP 281 seeks production of "all Documents related to the Pr***Na*** project." Pr***Native was Google's companywide effort to improve users' comprehension of the privacy controls available to them, as well as to provide them with better controls. This project related to Google's approach to privacy controls, including WAA, and it is therefore relevant to this case. But at least one important document concerning Pr***Na*** generally and the WAA control specifically slipped through the cracks of Google's normal custodial review, suggesting there may be others. Google must therefore conduct a non-custodial search for documents concerning Pr***Na***, and also must search its custodians' files for documents containing the term "Pr***Na***" or "Pr*** Na***" or "Pr***-Na***," and produce relevant, responsive documents it finds.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge